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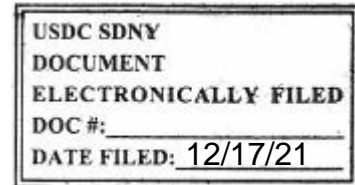
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December 13, 2021

**Via ECF**

Hon. Alison J. Nathan  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007



Re: United States v. Hassan Simmons, et al., 21 Cr. 280 (AJN)

Dear Judge Nathan:

I am CJA counsel to Hassan Simmons. I write, with no objection from the government or pre-trial services, to modify Mr. Simmons' bail conditions to remove the curfew and location monitoring technology.

Mr. Hassan has been on pre-trial release since May 7, 2021. His pre-trial services officer Joshua Rothman reports he is doing very well, and indeed, this application was his suggestion.

SO ORDERED.

Accordingly, we respectfully request that the Court modify Mr. Simmons' current bail conditions to remove the curfew and location monitoring. As noted, neither the government nor pre-trial services has any objection to this request.

I thank the Court for its attention to this matter.

12/17/21

Very truly yours,

/s/

Dawn M. Cardi

cc: AUSA Alexandra Rothman (via ECF)  
Pre-Trial Services Joshua Rothman (via e-mail)